#### **REMARKS**

The foregoing amendment amends claims 1, 13, 18 and 20. Now in the application are claims 1-27 of which claims 1, 13, 18 and 20 are independent. The following remarks address all stated grounds for rejection, and Applicant respectfully submits that the presently pending claims, as identified above, are in condition for allowance.

## Claim Amendments

Applicant has amended claims 1, 13, 18 and 20 to clarify the scope of the claimed invention. In particular, claims 1, 13, 18 and 20 have been amended to specifically describe the initial palette (in claim 1), the first color palette (in claim 13), the first pallette (in claim 18) and the initial color palette (in claim 20). Support for the claim amendment can be found in Figs. 2 and 3A-3F and corresponding descriptions in the specification of the pending application. No new matter has been introduced.

#### Rejection of Claims 1-3, 8-9, 12-14 and 17-23 Under 35 U.S.C. § 102

Claims 1-3, 8-9, 12-14 and 17-23 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,502,458 ("Braudaway"). Applicant respectfully traverses the rejection for the following reasons.

Independent claim 1 is directed to a method that provides color data for a group of pixels and builds an initial palette with the color data. For each pixel in the group of pixels, the color data is stored in the initial palette at an indexed position, which is determined based on the color data. The method converts the initial palette to a converted color palette and for each pixel in the group of pixels, substitutes the color representations in the converted color palette at the indexed position for the color data. Independent claims 13, 18 and 20 recite the first color palette, the first palette and the initial color palette, respectively, that correspond to the initial palette of claim 1.

Applicant submits that Braudaway does <u>not</u> disclose the initial palette, the first color palette, the first palette and the initial color palette, as recited in claims 1, 13, 18 and 20, respectively.

The claimed invention uses a temporary palette (the initial palette in claim 1, the first color palette in claim 13, the first palette in claim 18 and the initial color palette in claim 20) to accelerate the color conversion process of input color data. The claimed invention creates a mapping from input pixels to positions (indices) of the temporary palette, followed by a color conversion of the temporary palette to an output palette in an output color space. The output pixels are reconstructed using the indices and the output palette.

In the claimed invention, the temporary palette includes a single entry for multiple input pixels that have the same color data because the multiple input pixels having the same color data are mapped to the same position (index) of the temporary palette. The claimed invention therefore avoids the repeated conversion calculations for different pixels having the same color data. In this manner, the claimed invention reduces the number of conversion calculations, and performs the conversion with greater efficiency.

In comparison, Braudaway discloses a method for creating and displaying faithful color image on a specific computer display. Braudaway creates a palette calibration table (35) and a device independent image (45) from an original image (40). The palette calibration table (35) and the device independent image (45) are then transmitted to a specific computer system. The specific computer system calculates a display specific palette (55) from the palette calibration table (35) and from information about the specific display. The specific computer system then generates the faithful color image for display by sending the device independent image (45) and the display specific palette (55) to the display adapter in the specific computer system.

Braudaway discloses a standard palette (32) in Fig. 2A-1. The Examiner asserts in the Office Action that the standard palette (32) of the Braudaway reference corresponds to the initial palette, the first color palette, the first palette and the initial color palette, as recited in claims 1, 13, 18 and 20, respectively. See the Office Action page 2, lines 17-18. Applicant respectfully disagrees.

Braudaway discloses that "[e]ach standard palette entry is ordinarily specified in terms of its digital driving signals which are required in order to produce the color of the palette entry."

See Braudaway, column 5, lines 23-26. Fig. 2B of the Braudaway reference depicts the palette entries and corresponding r, g, b driving signals in the standard palette (32). The standard palette (32) in Braudaway is used to create the palette calibration table (35) and the device independent image (45) from the original image (40). Braudaway, however, does <u>not</u> disclose that the color data of the original image (40) is stored in the standard palette (32) at an indexed position, which is determined based on the color data of the original image (40), as recited for example in claim 1. The standard palette of the Braudaway reference therefore does <u>not</u> correspond to the initial palette, the first color palette, the first palette and the initial color palette, as recited in claims 1, 13, 18 and 20, respectively.

Furthermore, it appears that in Braudaway, every pixel in the original image must be individually processed and converted on a pixel by pixel basis. Braudaway does <u>not</u> appear to avoid the repeated conversion calculations for different pixels of the original image having the same color data.

In light of the foregoing claim amendments and arguments, Applicant submits that Braudaway does <u>not</u> disclose each and every element of claims 1, 13, 18 and 20. Applicant therefore requests the Examiner to reconsider and withdraw the rejection of claims 1-3, 8-9, 12-14 and 17-23 under 35 U.S.C. §102(b), pass the claims to allowance.

## Rejection of Claims 4-5, 10-11, 16 and 24-25 Under 35 U.S.C. § 103

Claims 4-5, 10-11, 16 and 24-25 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,502,458 ("Braudaway") in view of U.S. Patent No. 5,579,031 ("Liang"). Applicant respectfully traverses the rejection for the following reasons.

Claim 4-5, 10-11, 16 and 24-25 depend on one of independent claims 1, 13 and 20. Applicant submits that the combination of Braudaway and Liang does <u>not</u> teach *the initial palette, the first color palette and the initial color palette*, as recited in claims 1, 13 and 20, respectively.

Liang is cited by the Examiner to provide teachings for the limitations added in claim 4-5, 10-11, 16 and 24-25. Liang teaches a process for producing two matched color displays of a

digital image using two different display devices. Liang uses an adaptor to convert the digital information representing the image to digital information such that the displayed image as a result of this converted digital information on one of the devices, appears the same as the image displayed on the other. Liang, however, does <u>not</u> teach the initial palette, the first color palette and the initial color palette, as recited in claims 1, 13 and 20, respectively.

In light of this, Applicant submits that Braudaway and Lianfg, in combination, do <u>not</u> teach or suggest all of the limitations of independent claims 1, 13 and 20. Claim 4-5, 10-11, 16 and 24-25, which depend on one of independent claims 1, 13 and 20, are <u>not</u> rendered obvious over the cited prior art references. Applicant therefore requests the Examiner to reconsider and withdraw the rejection of claims 4-5, 10-11, 16 and 24-25 under 35 U.S.C. §103(a), and pass the claims to allowance.

## Rejection of Claims 6-7, 15 and 26-27 Under 35 U.S.C. § 103

Claims 6-7, 15 and 26-27 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,502,458 ("Braudaway") in view of U.S. Patent No. 5,668,890 ("Winkelman"). Applicant respectfully traverses the rejection for the following reasons.

Claim 6-7, 15 and 26-27 depend on one of independent claims 1, 13 and 20. Applicant submits that the combination of Braudaway and Winkelman does <u>not</u> teach *the initial palette, the first color palette and the initial color palette*, as recited in claims 1, 13 and 20, respectively.

Winkelman is cited by the Examiner to provide teachings for the limitations added in claim 6-7, 15 and 26-27. Winkelman teaches a method for analyzing an image. Winkelman teaches the image values of a first color space allocated to the input apparatus are transformed into image values of a second color space that is independent of the first color space. Winkelman teaches that the analysis of the image is implemented on the basis of the transformed image values of the second color space. Winkelman, however, does <u>not</u> teach the initial palette, the first color palette and the initial color palette, as recited in claims 1, 13 and 20, respectively.

In light of this, Applicant submits that Braudaway and Winkelman, in combination, do not teach or suggest all of the limitations of independent claims 1, 13 and 20. Claims 6-7, 15

and 26-27, which depend on one of independent claims 1, 13 and 20, are <u>not</u> rendered obvious over the cited prior art references. Applicant therefore requests the Examiner to reconsider and withdraw the rejection of claims 6-7, 15 and 26-27 under 35 U.S.C. §103(a), and pass the claims to allowance.

# Conclusion

In view of the remarks set forth above, Applicant contends that claims 1-27 are presently pending in this application, are patentable and in condition for allowance. If the Examiner deems there are any remaining issues, we invite the Examiner to call the undersigned at (617) 227-7400.

Applicant believes no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. OAQ-013 from which the undersigned is authorized to draw.

Dated: December 12, 2005

Respectfully submitted,

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